TRAINING FOR REVIEWERS

VANDERBILT UNIVERSITY CONFLICT OF INTEREST AND COMMITMENT

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WHAT IS A COI?

Individual **conflicts of interest** refer to situations in which an individual's or family member's financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, an individual's professional judgment in exercising any university duty or responsibility, including the conduct or reporting or research.

WHAT IS A COI (IN *PLAIN LANGUAGE*)?

- A COI may occur any time an individual's interests outside Vanderbilt may interact in any way with the individual's role at Vanderbilt.

- This can happen with financial interests, with family members, and with extra jobs. These are just common examples—there are many types of conflicts.

Personal
Interests
& Duties

Vanderbilt
Interests
& Duties

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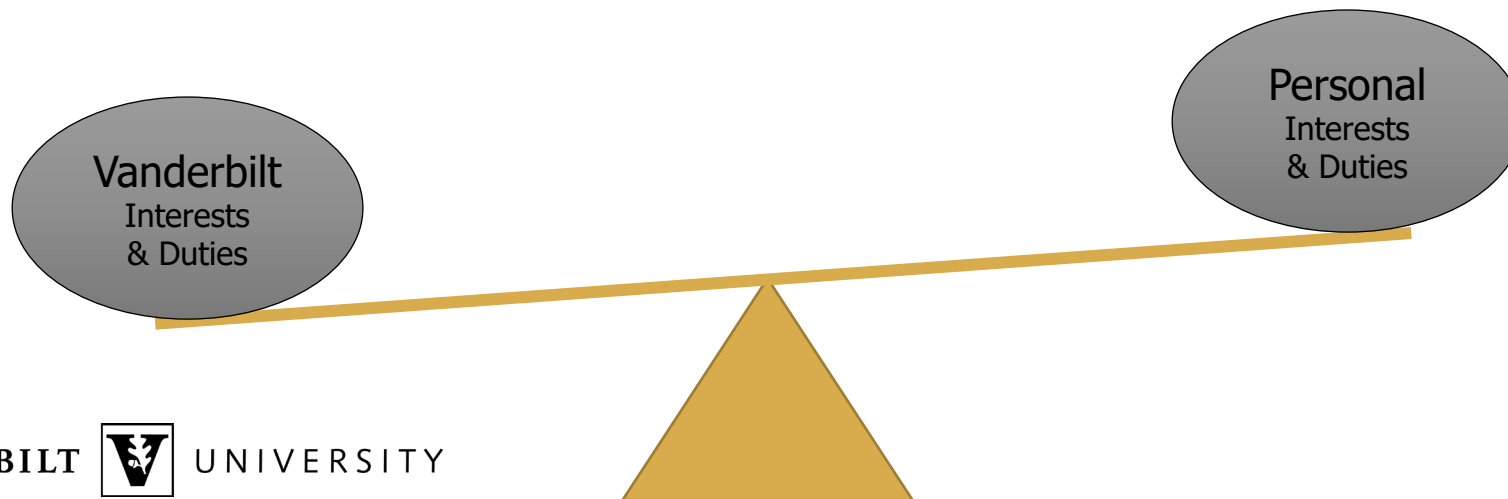
WHY IS THIS POLICY IMPORTANT?

- **Public Trust & Confidence**
  - The policy helps protect the trust and confidence that the public has in Vanderbilt as an academic center and research institution.
- **Individual & Institutional Reputations**
  - Without the policy, individual and institutional reputations could be harmed.
- **Sponsored Research Requirements**
  - Many research sponsors require it in their contracts or grant terms and conditions.
- **Protecting Individuals & Vanderbilt**
  - The policy serves to protect BOTH the University's interests and the interests of the faculty and staff who are disclosing.

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THE ROLE OF THE REVIEWER

- Reviewers are tasked with reviewing and approving conflict disclosures.

- For University faculty and postdocs, a Reviewer for each department is assigned by the Dean.

- For University staff, a Reviewer is each individual's line manager.

- The Reviewer is also responsible for ensuring any required management plan is followed.

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BASIC REVIEWER DUTIES

- ## **<u>Review</u>**
  - ➢ Reviewers thoroughly read and review ALL disclosures submitted to them.

- ## **<u>Approve</u>**
  - ➢ Reviewers determine if the disclosure should be approved. If the information provided is sufficient to determine whether a management plan is necessary, the reviewer should approve the disclosure.

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BASIC REVIEWER DUTIES (continued)

- **<u>Create Management Plans</u>**
  - ➢ If a conflict requires a management plan, the reviewer can create a plan from the pre-written plans in the Conflict Disclosure System, or the reviewer may consult with the COI Office to develop a plan.

- **<u>Signing Management Plans</u>**
  - ➢ The reviewer certifies that the management plan has been received by signing the management plan.
  - ➢ The reviewer monitors the situation to ensure the plan is followed during the year.

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HIGH LEVEL REVIEWER DUTIES

- Maintain general awareness of faculty, staff, and postdoc conflicts.

- Communicate with faculty, staff, and postdocs to ensure disclosure of all conflicts.

- Report back to the Dean (or Vice Chancellor) to ensure awareness of all conflicts.

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ADDITIONAL REVIEWER DUTIES

- Reviewers may be asked to assist the COI office in obtaining disclosures during the annual disclosure process.

- In addition, when novel questions arise, the reviewer may be asked to be a liaison with the Dean or Vice-Chancellor to determine how an individual school or area wants to address a conflict situation.

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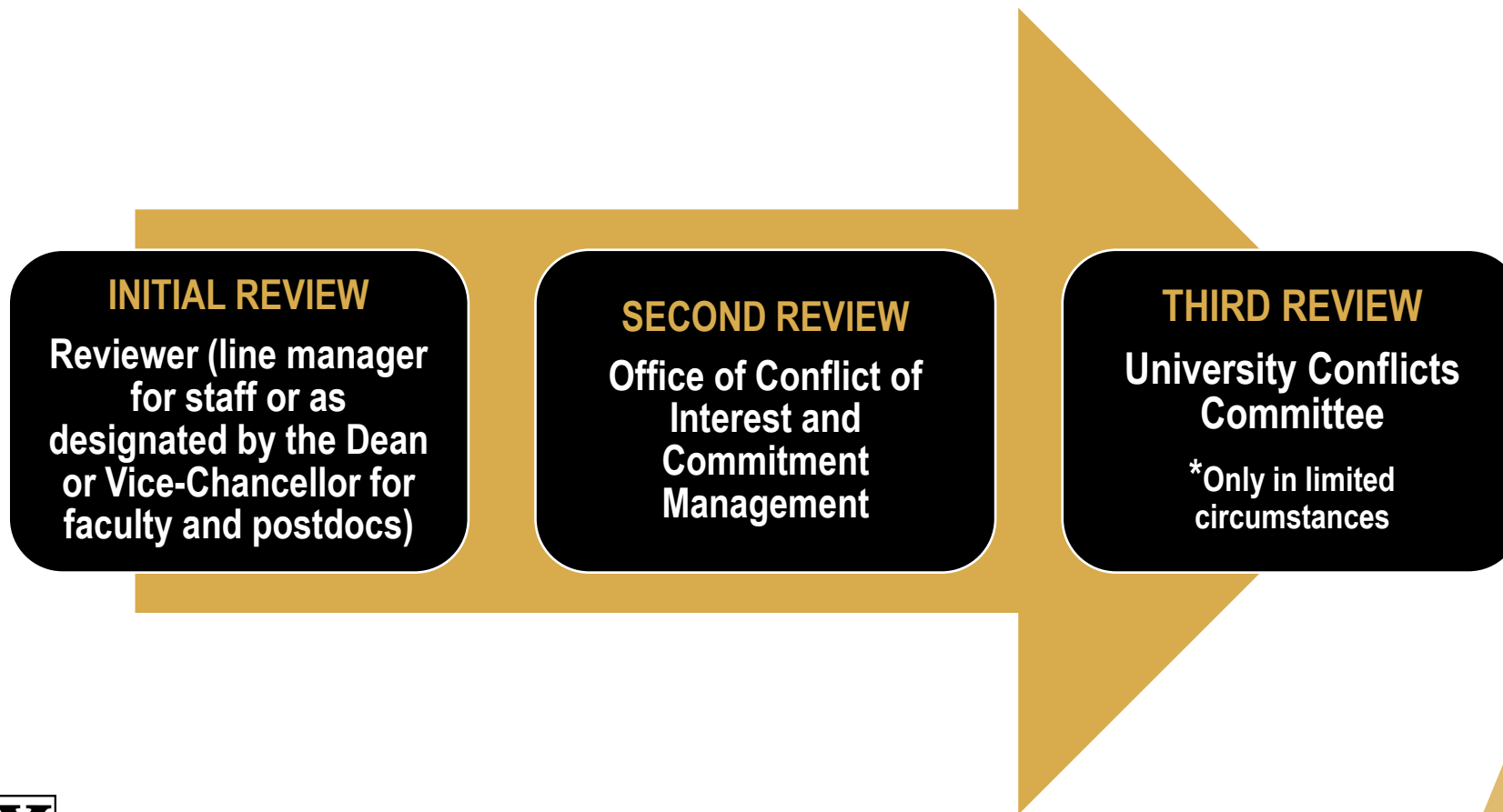
REVIEWER AWARENESS

- As a reviewer, you should remain available as a resource for faculty, staff, and postdocs completing disclosures.

- If you have reason to believe that any person completing a disclosure does not understand the questions (due to complexity or due to a language barrier), please contact the Office of Conflict of Interest and Commitment Management at any time for assistance.

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ACTING AS A DEAN'S DESIGNEE OR A VICE CHANCELLOR'S DESIGNEE

- Reviewers are considered designees of the Dean or Vice Chancellor. When a reviewer completes the conflict disclosure process, the approval given is viewed as the Dean's or Vice Chancellor's approval.

- Not only shall reviewers maintain knowledge and understanding of ongoing conflicts of interest and commitment in their area, reviewers must also report that information back to the Dean or Vice Chancellor to ensure awareness and to ensure consistency.

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REVIEW OF COI DISCLOSURES

WHAT HAPPENS WHEN YOU SUBMIT A DISCLOSURE?

INITIAL REVIEW

Reviewer (line manager for staff or as designated by the Dean or Vice-Chancellor for faculty and postdocs)

SECOND REVIEW

Office of Conflict of Interest and Commitment Management

THIRD REVIEW

University Conflicts Committee

*Only in limited circumstances

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CONSIDERATIONS FOR REVIEW

- Does this disclosure constitute a conflict of interest that requires management?

- If it is a conflict, can it be properly managed?

- If it can be managed, what requirements should the management plan contain?

- Conflicts that cannot be managed may be presented to the University Conflicts Committee for resolution (ie. cease and desist or other actions).

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FREQUENTLY ASKED QUESTIONS FOR REVIEWERS

HOW SOON SHOULD I REVIEW A DISCLOSURE SUBMITTED TO ME?

- As soon as possible!

- Federal regulations have many time-related requirements. If you fail to approve a disclosure, research funding may be at risk for your school or area.

- Reviews should occur all year long (not just during the annual disclosure process), <u>on a weekly basis</u>, so that you can ensure compliance with rules and regulations.

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WHAT HAPPENS IF I FAIL TO REVIEW DISCLOSURES IN A TIMELY MANNER?

- You may be putting federal funding at risk!

- The University has <u>no more than 60 days</u> to report back to some funding agencies about potential conflicts. If the reviewer does not complete the process in a timely manner, the COI Office and the University Conflicts Committee cannot review and potentially implement a management plan as required by COI policy and federal regulation.

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DOES THE COI OFFICE REVIEW A DISCLOSURE BEFORE THE REVIEWER?

- NO! The COI Office is one of the final steps in the COI review process. No notifications go to the COI Office until the reviewer has completed the initial review process!

- Timely review by the reviewer is necessary to the process.

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WHAT ARE THE REVIEWER DUTIES AFTER A MANAGEMENT PLAN IS PUT INTO PLACE?

- As a reviewer, you have been assigned the duty to be aware of the existence of the conflicts of all faculty and staff members in your area and to be knowledgeable about the contents of their assigned management plans. Reviewers have the task of ensuring that the management plan is implemented in a timely fashion and is followed by the faculty or staff member. It is also the reviewer's duty to monitor any changes in the conflict situation and determine whether the management plan should be adjusted based on those changes.

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WHAT IF THE CONFLICT CHANGES OR GOES AWAY WHEN THERE IS A MANAGEMENT PLAN IN PLACE?

- If a conflict changes, the faculty/staff member should inform their reviewer or supervisor and create a new disclosure in the system indicating the changes to the conflict. The reviewer and the COI Office will review the new disclosure to determine if the management plan needs to be changed.

- Likewise, if a conflict is removed, the faculty/staff member should inform their reviewer/supervisor and create a new disclosure in the system. The COI Office will review the new disclosure and the comments of the reviewer to determine whether a management plan is still required.

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OFFICE OF CONFLICT OF INTEREST AND COMMITMENT MANAGEMENT

The **Office of Conflict of Interest and Commitment Management** strives to provide excellent services to our customers, and our website includes many conflict of interest resources. Please feel free to contact us if you have any questions or would like our office to provide conflict of interest training to your University department.

CONTACT US

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Visit our website for additional resources:
https://www.vanderbilt.edu/generalcounsel/conflictofinterest/index.php

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